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UNITED STATES BANKRUPTCY COURT WESTERN DISTRICT OF NORTH CAROLINA CHARLOTTE DIVISION

| In re: | |
|-------------------|-------------------|
| | Chapter 11 |
| B GSE Group, LLC, | |
| | Case No. 23-30013 |
| Debtor. | |

MOTION FOR ADMISSION TO PRACTICE PRO HAC VICE

NOW COMES undersigned counsel for John Bean Technologies Corp., a creditor in the above-captioned case, and hereby moves pursuant to Local Bankruptcy Rule 2090-2 for admission *pro hac vice* of Steven McMahon Zeller ("<u>Applicant</u>") to the court for the purpose of representing John Bean Technologies Corp. In support of the Motion, the undersigned would respectfully show the Court the following:

- 1. Applicant is a member of the law firm of Dykema Gossett PLLC with offices located in Michigan, Texas, Illinois, California, Wisconsin, Minnesota, and Washington D.C.
- 2. Applicant is a member in good standing of the bar of the State of Illinois. Applicant is also admitted and in good standing before the United States Court of Appeals, Federal Circuit, and the following United States District Courts: Northern and Central Districts of Illinois and the Eastern District of Michigan.
- 3. Applicant's appearance in this matter will be in association with the undersigned, who is a member in good standing of the North Carolina State Bar and who is admitted to practice before this Court.
- 4. The Declaration of Applicant supporting this Motion is attached hereto and is incorporated herein by reference.

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5. The \$288.00 fee for admission *pro hac vice* is being submitted with the filing of this Motion.

WHEREFORE, the Movant respectfully requests that this Court enter an Order admitting Steven McMahon Zeller *pro hac vice* in this matter as set forth herein.

Dated: January 10, 2023 Charlotte, North Carolina

> HAMILTON STEPHENS STEELE + MARTIN, PLLC

/s/ Glenn C. Thompson

Glenn C. Thompson (NC Bar No. 37221) 525 North Tryon Street, Suite 1400 Charlotte, North Carolina 28202 Telephone: (704) 344-1117

Facsimile: (704) 344-1483 gthompson@lawhssm.com

Counsel for John Bean Technologies Corp.

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UNITED STATES BANKRUPTCY COURT WESTERN DISTRICT OF NORTH CAROLINA CHARLOTTE DIVISION

| In re: | | |
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| B GSE Group, | LLC, | |
| | | Case No. 23-30013 |
| Ι | Debtor. | |

DECLARATION OF STEVEN MCMAHON ZELLER IN SUPPORT OF MOTION FOR ADMISSION PRO HAC VICE

Steven McMahon Zeller, in support of the Motion for Admission *Pro Hac Vice*, declares as follows:

- 1. I am a member of the law firm of Dykema Gossett PLLC, 10 South Wacker Drive, Suite 2300, Chicago, Illinois 60606. My telephone number is (312) 876-1700, and my e-mail address is szeller@dykema.com.
- 2. I am and have been a member in good standing before the following United States
 District Courts: Northern and Central Districts of Illinois and the Eastern District of Michigan.
 - 3. I am in good standing in all courts where I have been admitted.
 - 4. I have never been disbarred, suspended, or denied admissions to practice.
 - 5. I declare under the penalty of perjury that the foregoing is true and correct.

This the 10th day of January, 2023.

Steven McMahon Zeller, Declarant

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CERTIFICATE OF SERVICE

I hereby certify that on this day, the foregoing Motion for Admission to Practice *Pro Hac Vice* and Declaration of Steven McMahon Zeller were served by electronic means on those parties registered with the United States Bankruptcy Court, Western District of North Carolina ECF system to receive notices for this case.

Dated: January 10, 2023

Charlotte, North Carolina

HAMILTON STEPHENS STEELE + MARTIN, PLLC

/s/ Glenn C. Thompson

Glenn C. Thompson (NC Bar No. 37221) 525 North Tryon Street, Suite 1400 Charlotte, North Carolina 28202

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Counsel for John Bean Technologies Corp.